

EXHIBIT A

Whitney, Andrew C.

From: Butler, Michael (USAPAM) [Michael.J.Butler@usdoj.gov]
Sent: Tuesday, February 28, 2012 9:33 AM
To: Whitney, Andrew C.
Subject: Womack

Andrew, this is to confirm we will have a pre-pre-trial conference on April 3, 2012 at 10:00 a.m. by teleconference. This is also to confirm that we will be seeking to introduce Womack's prior and post disciplinary issues, the videos of all restraint periods, and his current place of incarceration. You have told us that you will supplement your disclosures with the names of mental health professionals. We will also supplement our disclosures to note that we will be calling numerous officials who witnessed Womack in restraints. The list is growing and we continue to add to it. We hope to have a final list soon. The names, however, have previously been disclosed in the 15 minute check log, 2 hour check log, and medical records. Lastly, based on the restraint policy, we will seek to introduce Womack's criminal record, which is a factor in his restraint placement (as seen in all the videos). Let me know if you would like to discuss this further.